UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

November 17, 2014

Donald Rose, Supervisory Environmental Protection Specialist
Bonneville Power Administration
P.O. Box 3621, KEC-4
Portland, Oregon 97208-3621

Re: EPA Comments on the Bonneville Power Administration Walla Walla Basin Spring Chinook Hatchery Program Draft Environmental Impact Statement - EPA Project Number: 13-0013-BPA

Dear Mr. Rose:

We have reviewed the October, 2014 Bonneville Power Administration Walla Walla Basin Spring Chinook Hatchery Program Draft Environmental Impact Statement (Draft EIS). Our review was conducted in accordance with the EPA's responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Our review of the Draft FR/EIS considers the expected environmental impacts of the proposed action and the adequacy of the EIS in meeting the procedural and public disclosure requirements of NEPA. We are rating the Draft EIS Lack of Objections (LO). A copy of our rating system is enclosed.

Project summary
The Draft EIS analyzes impacts from the construction and operation of a hatchery for spring Chinook salmon in the Walla Walla River basin in northeast Oregon. The hatchery would be constructed at an existing Confederated Tribes of the Umatilla Indian Reservation (CTUIR) fish facility on the South Fork Walla Walla River. The CTUIR would own and operate the hatchery to augment spring Chinook fish populations available for harvest and aid in establishing a naturally spawning spring Chinook population in the Walla Walla River Basin. There are two action alternatives. Alternative 1 includes production of up to 500,000 Walla Walla spring Chinook smolts. Alternative 2 also includes relocation of the production of Umatilla spring Chinook from the existing Umatilla Hatchery. The proposed hatchery was identified in the Northwest Power and Conservation Council's Fish and Wildlife Program – a regional program designed to protect and rebuild fish and wildlife populations affected by hydropower development in the Columbia River Basin.

Responsiveness to scoping comments
The Draft EIS is responsive to our April, 2013 scoping comments. Our project specific recommendations focused on water quality, climate change adaptation, and sustainable/green design.

With regard to water quality, the Draft EIS usefully describes how project facilities would comply with federal and state water quality standards and related permitting requirements. We appreciate, for example, your construction of a physically-based temperature model to predict the temperature of hatchery effluent and resulting temperature increases in the South Fork Walla Walla River. We also recognize your model's result that both action alternatives would reduce river temperatures relative to existing conditions as a potential environmental benefit. For permitting, we appreciate your inclusion of up-to-date information, based on personal communications with Oregon Department of Environmental Quality.

For climate change adaptation, we recommended that the Draft EIS describe how climate change effects have been considered. We agree that lower summer flows are a potential climate change impact and support your proposed methods to reduce water demand at the hatchery – such as circular rearing tanks as opposed to raceways and a pumpback system to help avoid reducing river flows below state-established minimum instream flows. In addition to these methods, which are common to both action alternatives, we believe that water reuse should be a required component of constructing Alternative 2. Water reuse should be a required component of Alternative 2 because it would save energy by reducing the need to utilize the pumpback system and because it would reduce the risk of river flows below state-established minimums. In addition, because accurate flow data will be an important part of managing the hatchery's impact on the river over time, we recommend that the existing gage at Harris Park be upgraded. This upgrade will help the Oregon Water Resources Department and hatchery operators better monitor flows at the intake.

For sustainable/green design we recommended consideration of surge tanks and gravity fed systems to reduce the number of pumps needed and a recirculating aquaculture system. Thanks to the Draft EIS, we now understand that a gravity fed system is not possible due to a lack of slope at the site. And, the Draft EIS's water reuse system proposal is responsive to our recirculating aquaculture recommendation.

Final EIS recommendation

In addition to our recommendations to implement water reuse and upgrade the existing gage at Harris Park, we believe the final EIS should include additional information on Phase 3 of the hatchery's operation. We applaud BPA and CTUIR for including a clear statement of goals and objectives for the proposed project, including a plan to terminate South Fork releases when the 5-year mean return exceeds 5,500 natural-origin adults. Achieving this goal - restoring spring Chinook salmon to an area from which it has been extirpated - would have numerous social, cultural, economic and environmental benefits.

In order to more fully disclose how the project would help achieve this important Phase 3 goal, we recommend that the final EIS compare - to the extent possible - the likely time-periods needed to reach a return of 5,500 natural-origin adults under no-action and the action alternatives. Also, because losses have generally been attributed to habitat degradation and fish passage constraints,[1] we recommend that the final EIS include additional information describing how habitat improvements in the basin are or will be adequate to sustain a return of 5,500 natural-origin adults over the long term.

[1] Draft EIS, p. 1-5

Thank you for this opportunity to comment and if you have any questions, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or Erik Peterson, the lead reviewer for this project. Erik can be reached at (206) 553-6382 or peterson.erik@epa.gov.

Sincerely,

Christine Reichgott, Unit Manager
Environmental Review and Sediment Management Unit

Enclosure:
1. EPA Rating System for Draft Environmental Impact Statements

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.